UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW MEXICO

Case No. 19-10540-t13

In re: STEPHEN GUAJARDO
ROBERTA GUAJARDO-GARCIA

Debtor(s).

**REQUEST FOR HEARING** 

COMES NOW, Jason Cline, LLC (Jason M. Cline) ("Attorney"), former attorney for the debtor(s) and hereby requests a hearing be set on Attorney's Application for Allowance and Payment of Attorney's Fees, Costs and Taxes (the "Application") (Doc. # 45), Debtor's Response to the Application (the "Response") (Doc. # 60) and Attorney's Reply to the Response (Doc. # 61), and as grounds states as follows:

- 1. Attorney filed the Application on July 1, 2019 (Doc. # 45).
- 2. Debtor filed the Response on July 25, 2019 (Doc. # 60).
- 3. Attorney filed the Reply on July 30, 2019 (Doc. #61).
- The Court entered an Order Approving the Application (the "Order") on July 30, 2019
   (Doc. # 62).
- 5. Debtors' former counsel, Ronald Holmes, raised a question as to whether the Order was entered prematurely and whether the Response was timely filed.
- 6. In the Reply, Attorney requested that the Court enter an Order requiring Debtors to withdraw their dispute with their bank on the debit card transaction used to pay Attorney the down payment of \$1,978.13, which consisted of \$1,668.13 in attorney fees and costs, which were requested in the Application, and the filing fee of \$310.00. Or, in the alternative, if the bank has returned this money to Debtors, ordering them to pay Attorney these fees.

**WHEREFORE**, the Debtor requests that a hearing be held on these issues.

Dated: <u>08/21/2019</u> RESPECTFULLY SUBMITTED,

/s/ Jason M. Cline "Filed Electronically"
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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 21, 2019, the foregoing pleading was filed electronically through the CM/ECF system, which caused all counsel of record to be served.

<u>/s/ Jason M. Cline</u> Jason M. Cline